	Commenter
1	Delta Research and Extension Center, Jeffrey Gore
2	Anonymous
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4	Anonymous

5	Anonymous
6	Chris Voigt, Executive Director, Washington State Potato Commision
7	Mark W. Sweetin, Director, US Apple Association
8	John Keeling, Executive Vice President and CEO, National Potato Council
9	Jerry Barron and Dan Kunkel, Executive and Associate Directors, IR-4
10	A. Catchot
11	Kathy Flanders, Extension Entomologist and Professor, Dept of Entomology Auburn University

12	Michael Bledsoe, Senior Vice President, Food Safety and Reg Affairs, Village Farms International & Rep for Certified Greenhouse Farmers Association
13	D. Walsh, Ph.D. Professor of Entomology Research Director Environmental and Agricultural Entomology Lab Coordinator, Integrated Pest Management Washington State University

Comment
The purpose of this letter is to support the proposed registration of Flupyradifurone from Bayer CropScience. My comments will be related to the Sivanto 200 SL label and its uses in cotton and cereal grains (sorghum), and sugar cane. In research plots from across the southern U.S. in 2014, flupyradifurone provided very good control of this insect. Therefore, the registration of flupyradifurone would provide at least one insecticide to manage this devastating pest. I highly support the proposed registration of flupyradifurone. It will provide a valuable alternative to sulfoxaflor for cotton aphid in cotton and the only option for sugarcane aphid control in sorghum.
I support this potential registration. Because this product is being considered for registration, I encourage EPA to evaluate and weigh the benefits and drawbacks of such a registration evaluating: environmental impacts, potential acute and chronic impacts on human health, data on the impact of this product on non-target, natural enemies and pollinators and economic impacts on crop production. We have had a significant outbreak of the sugarcane aphid in Oklahoma sorghum this past year. Currently registered products are very ineffective. Yield loss suffered by sorghum growers exceeded 20% in some cases. While I have not tested this particular product, I have evaluated an active ingredient with a similar mode of action that was approved as a section 18 emergency exemption. It provided very effective control. I have reviewed data from trials that evaluated this particular active ingredient, and it is also quite effective. As the label is developed, design it so that its use patterns have minimal environmental and human health consequences.
I support the registration of Flupyradifurone. As a researcher with the University of Georgia, I have had the opportunity to evaluate the product particularly as a whitefly control material. The product is easy to handle, it provides exceptional control of whitefly infestation in squash and tomato, and it is the only whitefly material that I have evaluated that has significantly reduced Begomovirus incidence in the field. I have not observed any phytotoxicity in the recommended rates provided by the company.
I encourage approval of the registration of Sivanto as it will provide our growers with a valuable tool for management of silverleaf whitefly.

Flupyradifurone is an important new tool for managing citrus pests that will help reduce ineffective insecticide applications and manage the vector of a devastating disease of citrus.
The economy of Central Washington relies heavily on the production and processing of potatoes. Many of these rural communities would suffer extreme hardship if restrictions prevented the current level of potato production and processing.
A significant portion of the fresh apple crop is exported. Because of that fact, it is important that MRLs be established for flupyradifurone in a timely manner. Failure to finalize MRLs could seriously hamper the ability of growers to use it, and would reduce the ability for growers to choose from a variety of crop protection chemicals for their IPM and RM programs. Therefore, we respectfully urge that the EPA grant the registration request for flupyradifurone and support the establishment of MRLs in an expeditious manner.
We strongly urge the U.S. Environmental Protection Agency (EPA) to expeditiously approve Sivanto for use on potatoes. When approved, Sivanto is expected to provide a highly effective and selective tool for addressing potato pests including aphids, the potato psyllid, and leafhoppers.
IR-4 appreciates the opportunity to work with modern state of the art products like Flupyradifurone that provide significant honey bee safety so that critical pests can be controlled during bloom and play a role in integrated pest management programs. This one factor makes the product incredibly important for specialty crops, many of which are reliant on pollination by honey bees.
In research plots from across the southern U.S. in 2014, flupyradifurone provided very good control of this insect. Additionally this product has one of the safest toxicological profiles for pollinators tested. In conclusion I strongly support the registration of flupyradifurone in cotton and grain crops.
My comment is in reference to the dire need for flupyradifurone on all types of sorghum. Flupyradifurone has been shown to be highly effective against Melanaphis sacchari and has a very favorable environmental profile. Sorghum producers desperately need an effective control for Melanaphis sacchari. I recommend that the use of this active ingredient be approved by the EPA.

Flupyradifurone will be submitted for registration in 2015 by Bayer and IR-4 for Greenhouse tomato and cucumbers. This material is very important to the future of our industry. It has demonstrated efficacy both foliar and drench for aphids, leafhoppers, Whiteflies, Scales, Psyllids, and Scirtothrips. Flupyradifurone on Greenhouse insects was chosen as an IR-4 A priority for registration, because it manages several critical pests with limited risk/damage to bumble bees.
Flupyradifurone will provide alfalfa seed (and potentially other seed crop producers) with an extremely effective tool for managing their key insect pests while simultaneously not harming their essential bee pollinators.